

**Rocky Mountain  
Remediation Services, L.L.C.**  
*... protecting the environment*

Rocky Flats Environmental Technology Site  
P.O. Box 464  
Golden, Colorado 80402-0464  
Phone: (303) 966-2678  
Fax: (303) 966-8244



000060966

CORRES. CONTROL  
OUTGONG LTR NO.

February 1, 1996

96-RF-00711  
96-RM-ER-015-KH

DOE ORDER # None  
96 RF 00711

DIST.	LTR	ENC
Bengal, P.		
Benson, C. A.		
Buddy, M. S.	X	X
Evans, C. S.		
Findley, M.		
Gunn, G.		
Gunn, L.		
Hopkins, J.		
Jenkins, K.		
Jierree, C.	X	X
Konwinski, G.		
Law, J. E.	X	X
Luker, R.S.		
McAnally, J. L.		
McHugh, M. F.		
Motyl, K. M.	X	X
Parker, A. M.	X	X
Primrose, A. L.		
Power, A.		
Schubbe, D. L.		
Steffen, D. E.		
Tyson, A. M.		
Zeile, H.		
Denike, R.	X	X
Spence, T.	X	X
Swabb, G.	X	X
Weinherbee, G.	X	X
ER REC CTR (2)	X	X
RMRS CC	X	X
CORRES CONTROL	X	X
TRAFFIC		

Ann K. Sieben  
Kaiser-Hill, L.L.C.  
Rocky Flats Environmental Technology Site  
P. O. Box 464, Bldg. T130C  
Golden, CO 80402-0464

UNPERMITTED DISCHARGES OF BUILDING 887 SEPTIC LIFT STATION (KH00003NS1A) – AMP-015-96

Action: As stated

Overflows of the Building 887 septic lift station, constituting unpermitted discharges to the environment, have occurred repeatedly (most recently on December 28, 1995) and represent a significant Clean Water Act (CWA) liability to the Rocky Flats Environmental Technology Site (RFETS). Unpermitted discharges from Building 887 must either be curtailed immediately, or RFETS may be required to provide additional funding to obtain and implement a modification to the Site National Pollution Discharge Elimination System permit. A detailed description of discharges and issues with a recommended corrective action follows.

On Thursday, December 28, 1995, Industrial Area Interim Measure/Interim Remedial Action (IA IM/IRA) surface water monitoring instrumentation recorded a 5,500-gallon discharge from the Building 887 septic lift station. Preliminary analysis of this discharge shows high in fecal coliform and is essentially raw sewage. Discharges from this location continue to occur despite our efforts to notify the responsible parties and offer mitigative alternatives.

Releases from this location were first identified on June 17, 1995. This release involved 5,000 gallons which was also analyzed as raw sewage. Several more releases were noted:

June 21, 1995	715 gallons
July 1, 1995	112 gallons
August 28, 1995	3336 gallons (sampled)
November 4, 1995	546 gallons
December 28, 1995	5537 gallons (sampled)

Notification was made to L. C. Rock on June 28, 1995 (attachment 1) and to R. H. Essig on August 8, 1995 (attachment 2) regarding the first release. Mitigative alternatives were also suggested in these letters.

22.015.F

### ACTION ITEM STATUS

☐ OPEN      ☐ CLOSED  
☐ PARTIAL

TR APPROVALS:

ORIG & TYPIST INITIALS:

MSB

ADMIN RECCRD

BZ-A-000365

FEB 1996  
RECEIVED  
RECORDS CENTER

Ann K. Sieben  
February 1, 1996  
96-RF-00711  
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The cause of these discharges are generally due to overflows of the septic lift station because of power interruptions in Building 887. Actions designed to mitigate these releases are relatively simple and involve changes in the building operating procedure. In the event that power interruptions are planned, Building 881 management should arrange, through Trucking, for the sanitary sewer tanker to pump lift station effluent and transport it to the waste water treatment plant so that it will not overflow onto the hillside. Additionally, all contributing operations should be minimized to prevent the tanker from being overfilled. Unplanned power interruptions should be handled in a similar fashion. These actions are "best management practices" and are a practical and cost effective way to eliminate this discharge to the environment. If the releases continue, a modification to the Site's National Pollutant Discharge Elimination System permit must be received for this release point. This modification would add costs to the monitoring and reporting requirements of the Site.

We recommend that Kaiser-Hill contact the Building 881 Operations/Building Manager and request written acknowledgement of implementation of the above procedures. The annual results of the Industrial Area IM/IRA monitoring are to be reported to the regulatory agencies by March 31, 1996. At this time it is hoped that we may report on the successful completion or the initiation of corrective actions for this release pathway.

If you have any questions, or need additional information, please call Mark Buddy at extension 4128.



Alan M. Parker  
Environmental Restoration Project  
Rocky Mountain Remediation Services, L.L.C.

MSB:jbd

Attachments:  
As Stated (2)

cc:

G. M. Kelly	- Kaiser-Hill
G. H. Setlock	- Kaiser-Hill
R. H. Essig	- Safe Sites



## INTEROFFICE CORRESPONDENCE

DATE: June 28, 1995  
TO: L. C. Rock, Environmental Compliance, Bldg. 881, X5964  
FROM: P. L. McCarthy, Surface Water, Bldg. T893A, X7320 *pm*  
SUBJECT: SANITARY OVERFLOW DISCHARGE TO 881 HILLSIDE - PLM-006-95

On Saturday, June 17, 1995, Surface Water (SW) monitoring activities registered flow from a pipe of unknown origin on the 881 hillside. Flow monitoring shows that approximately 6,700 gallons were discharged, and lab results indicate fecal coliform levels consistent with raw sewage. On Friday, June 23, 1995, SW performed a walk down of the Building 881 sanitary sewer lift station and overflow discharge in an effort to determine the events which resulted in this release.

Based on information gathered during the walkdown, the events leading to this release are as follows: Electricity to the Building 887 lift station was disconnected for approximately 10 hours on June 12 while a new feeder line was installed. Building personnel were notified not to use the facilities, but it appears there are blowdowns of the air washers at this time of year. In addition, Building 891 was not notified of the shutdown and routine discharges could have occurred from that source.

The actual sources of this flow were not determined. However, based on the presence of fecal coliform, at least some sanitary waste, as well as other miscellaneous flows from the buildings flowed to the Building 887 lift station and overflowed the coffer dam which discharges to a 6 inch pipe on the 881 hillside. There is a lagoon located below the discharge pipe which collected the entire 6,700 gallon discharge. This connection has been reported previously to the regulators in the Historical Release Report.

Based on this information, SW determined that no harm to human health or the environment occurred. SW is reviewing the compliance issues associated with the continued existence of this potential discharge of raw sewage. If there are notification requirements, SW will initiate the action. Meanwhile, there is a concern about the potential for a repeat of this event.

Therefore, as a precautionary measure, and in keeping with Best Management Practices, it will be necessary for Building 881 management to notify all buildings and areas that have sewer systems that connect with the Building 881 system when work on the Building 881 system is to be performed. If that work will result in the temporary shutdown of the lift station, all contributing operations must be shut down for the duration of the work. In addition, Building 881 should consider shutting off the water to the building to prevent the use and subsequent discharge while the lift station pump is out of service.

If you have any questions, please contact me at extension 7320.

fm

cc:

M. S. Buddy  
R. E. Fiehweg  
S. A. Marshall



Rocky Flats Environmental Technology Site  
P.O. Box 464  
Golden, Colorado 80402-0464  
Phone: (303) 966-2677  
Fax: (303) 966-8244

August 8, 1995

Richard H. Essig  
Facility Manager Buildings 881, 883, and 886  
Safe Sites of Colorado

**SANITARY OVERFLOW DISCHARGE TO 881 HILLSIDE - SAM-076-95**

On Saturday, June 17, 1995, Surface Water (SW) monitoring instrumentation recorded a ~~6700~~ <sup>Saw</sup> gallon discharge from a pipe of unknown origin on the 881 Hillside. Lab analysis of this water indicated fecal coliform levels consistent with raw sewage. On Friday, June 23, 1995, SW performed a walk down of the Building 881 sanitary sewage lift station and overflow discharge in an effort to determine the events which resulted in this release. Based on information gathered during the walkdown, the events leading to this release were as follows:

Electrical power to the Building 887 lift station was disconnected for approximately 10 hours on June 12, 1995, during the installation of a new electrical feeder line. Building personnel were notified not to use the facilities, but it appears there were blowdowns from the cooling tower and a number of air washers operating at this time of year.

On July 12, 1995, SW performed a dye test confirming that the flow to the lagoon on the 881 Hillside originates from the Building 887 sanitary lift station. Although SW determined that no harm to human health or the environment occurred, SW also reviewed the compliance issues associated with the continued existence of this discharge of raw sewage. Should this discharge be allowed to continue, a National Pollutant Discharge Elimination System permit would need to be applied for and received by the Site, adding monitoring and reporting requirements. It is more practical and cost effective to implement a policy which identifies Best Management Practices (BMP) and eliminate this discharge to the environment.

SW remains concerned over the potential for a repeat of this event; therefore, in order to avoid regulatory control of this facility, the following BMPs must be implemented immediately:

1. Building 881 management shall notify all buildings and areas that have sewer systems that connect with the Building 881, system any time work on the Building 881 sewage lift station is to be performed. If that work will result in the temporary shutdown of the lift station, all contributing operations must be shut down for the duration of the work.

R. H. Essig  
August 3, 1995  
SAM-076-95  
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2. Building 881 management must arrange, through trucking, for the sanitary sewer tanker to pump lift station effluent during any planned power outage. Sufficient time should be allowed to get the tanker to the lift station and remain there for the duration of the power outage.

If you have any questions, please call me at extension 2325 or Peggy McCarthy at extension 7320.



S. A. Marshall  
Team Leader  
Sitewide Surface Water

fm

cc:  
M. S. Buddy  
R. F. Daley  
R. E. Fiehweg  
J. E. Law  
P. L. McCarthy  
H. B. Padron  
G. H. Setlock  
W. J. Suder